

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No.: 1:25-cv-20757-JB

JANE DOE,

Plaintiff,

v.

STEVEN K. BONNELL II,

Defendant.

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**DECLARATION OF ANDREW B. BRETTLER IN SUPPORT OF DEFENDANT
STEVEN K. BONNELL'S OPPOSITION TO PLAINTIFF'S MOTION FOR
PROTECTIVE ORDER GOVERNING PUBLIC COMMENTARY BY TRIAL
PARTICIPANTS**

I, Andrew B. Brettler, declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned action. I am a partner at the law firm Berk Brettler LLP in West Hollywood, California. Along with our local counsel at Bilzin Sumberg Baena Price & Axelrod LLP, we represent defendant Steven K. Bonnell II. I have personal knowledge of the matters contained herein and if called upon to testify could offer competent testimony thereto.

2. I submit this Declaration in opposition to Plaintiff's Motion for Protective Order Governing Public Commentary By Trial Participants [ECF No. 84].

3. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's post on her X account, published on May 19, 2025, in which she wrote, "Please don't hesitate to contact me if you believe you might be a witness or another victim."

4. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff's post on her X account, published on May 19, 2025, in which she wrote, "COURT UPDATE: Good news, despite

opposition from Destiny's council [sic], the court has granted us the ability to keep witnesses [sic] identity under seal. If you have any information regarding the case, we can file to keep your name out of public and protected by the court . . . Please don't hesitate to contact me if you believe you might be a witness or another victim . . . Also please help and donate if you can to help keep this case going. Every dollar counts."

5. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff's post on her X account, published on June 9, 2025, in which she wrote, "This is literally playing into the humiliation/defamation/public harassment campaign that's being used to scare other victims into silence."

6. Attached hereto as **Exhibit D** is a true and correct copy of Plaintiff's post on her X account, published on May 20, 2025, in which she wrote, "I have not lied about anything. The emails you have posted further illustrate my point. I suggest you re-read the objection your legal counsel filed. Your legal team asked to file unredacted versions before the deal was granted, *or* strike them from the record. If this was truly a civil rights problem, why even suggest withdrawing/striking from the record? Wouldn't the demand only be to know of the identities?"

I declare, under penalty of perjury, that the foregoing is true and correct. Executed on June 16, 2025.

/s/ Andrew B. Brettler
Andrew B. Brettler